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MEMO ENDORSED

REPLY TO MONTCLAIR OFFICE

July 17, 2020

Via email and ecf
Honorable Valerie E. Caproni
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

USDC SDNY
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DATE FILED: 7/17/2020

Re: *United States v. Edwin Cortorreal*, 17 Cr. 438 (VEC)

Dear Judge Caproni:

I represent Edwin Cortorreal in this case. I write, respectfully, to request that the status conference scheduled for Monday, August 3, 2020 be continued until the mid-September, 2020. With the exception of a single weekend, MCC has been shut to attorney visits since Mr. Cortorreal was first remanded there. When it opened briefly on March 7, 2020, I immediately went with a discovery disk to see him, only to find that the visit was in a room with no desks or computers and with other attorney-client visits taking place within a few feet. Five days later, all visits were cancelled and have remained so ever since.

During the lock-down, MCC inmates have had limited, if any access to their discovery, although work is in progress to remedy that issue. I have had several time-limited phone calls and video conferences, none of which have been private. I have also attempted video calls to introduce Mr. Cortorreal to our investigator, but each time that failed to happen. No in-person investigation has been possible.

Under these circumstances, it is respectfully requested that the status conference be adjourned until at least the middle of September. The Government has no objection to this request and the parties consent to the exclusion of time under the Speedy Trial Act.

Thank you for your attention to this request.

Respectfully submitted,

Jean D. Barrett
Jean D. Barrett

cc via ecf: AUSA Hagan Scotten

Application GRANTED. The status conference currently scheduled for August 3, 2020 is adjourned to **September 15, 2020 at 2:00 p.m.** The period of time between August 3, 2020 and September 15, 2020, is excluded under the Speedy Trial Act. The Court finds that the Defendant's need to review the discovery and to consult with counsel outweigh the Defendant's and the public's interests in a speedy trial.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

7/17/2020